

### REMARKS

With the above amendments, claims 1-2, 4-8, and 13-20 remain in the application. Claim 3 has been cancelled.

#### Claim Rejections -- 35 U.S.C. § 102

Claims 1-3, 5-6, 8, 13-14, 17, and 19 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Publication No. 2002/0031420 A1 by Kroeker ("Kroeker").

In the last office action, claim 3 was rejected based on Kroeker's process chambers 604 shown in its FIG. 12. As shown in Kroeker's FIG. 12, the three process chambers 604 are three separate modules and, therefore, does not comprise a process module with a plurality of processing stations as recited in claim 3. Kroeker does not disclose or suggest the use of a multi-station process module. Therefore, claim 3 is patentable over Kroeker. The features of claim 3 have been incorporated in claim 1. Therefore, it is respectfully submitted that claim 1 is patentable over Kroeker.

The terms "process module" and "process chamber" are interchangeably used in the industry (e.g., see Specification, Background). Nevertheless, claim 1 has been amended to recite "process chamber" instead of "process module" to expedite prosecution of the pending claims.

Claims 2 and 4-8 depend on claim 1. Therefore, claims 2 and 4-8 are patentable for the same reasons, as well as because of the combination of features set forth in these claims and in claim 1.

Claim 13 is patentable over Kroeker at least for reciting: "a plurality of load locks, each of the plurality of load locks having an opening in direct communication with the process chamber and another opening in communication with the loading station." In Kroeker, each chamber has a dedicated load lock (Kroeker, FIG. 12). Kroeker thus discloses an architecture that is significantly different from that recited in claim 13. In

claim 13, each of the plurality of load locks is in communication with the same process chamber. Therefore, claim 13 is patentable over Kroeker.

Like claim 1, claim 13 has been amended to recite "process chamber" instead of "process module" to expedite prosecution of the pending claims.

Claims 14-20 depend on claim 13. Therefore, claims 14-20 are patentable for the same reasons, as well as because of the features set forth in these claims and in claim 13.

Claims 13 and 17-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. US 2002/0033136 A1 by Savage et al. (hereinafter "Savage").

Claim 13 is patentable over Savage at least for reciting: "a plurality of load locks, each of the plurality of load locks having an opening in direct communication with the process chamber." That is, claim 13 recites that there are several load locks coupled to the same process chamber. Savage discloses a load lock 80 coupled to chamber 40, while another load lock 80 is coupled to another chamber 40 (see Savage, FIG. 2). Therefore, claim 13 is patentable over Savage.

Claims 17-20 depend on claim 13. Therefore, claims 17-20 are patentable over Savage for at least the same reasons, as well as because of the combination of features set forth in these claims and in claim 13.

#### Claim Rejections -- 35 U.S.C. 103

Claims 4, 7, 8, 15, 16, 18, and 20 stand rejected under 35 U.S.C. 103(a) based partly on Kroeker, Savage, or both. As discussed above, neither Kroeker nor Savage meet all the limitations of independent claims 1 and 13. Because claims 4, 7 and 8 depend on claim 1, and claims 15, 16, 18, and 20 depend on claim 13, the aforementioned dependent claims are patentable for at least the same reasons that their respective independent claims are patentable.

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Conclusion

For at least the above reasons, it is respectfully submitted that claims 1-2, 4-8, and 13-20 are in condition for allowance. If the next communication is other than a Notice Of Allowance, the Examiner is invited to telephone the undersigned at (408)436-2112.

If for any reason an insufficient fee has been paid, the Commissioner is hereby authorized to charge the insufficiency to Deposit Account No. 50-2427.

Respectfully Submitted,  
Craig L. Stevens

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